

# **EXHIBIT B**

Jess Dickinson 11/29/2018

1 A. No.

2 Q. Has your chief of staff ever run a child  
3 welfare system or worked in a child welfare  
4 system?

5 A. That's the same question you asked me  
6 before about him? Mr. Cheeseman?

7 Q. Mr. Cheeseman.

8 A. Yeah, I think what I told you was yes,  
9 he has. He's worked in --

10 Q. He didn't work in a child welfare  
11 system, though, did he?

12 A. Well, I don't think you can separate the  
13 youth court from the child welfare system, and  
14 he's worked in the youth court of Rankin County,  
15 and the youth court of Hinds County. And so yes,  
16 he has -- he has.

17 Q. He worked in --

18 A. He has before -- I'm sure your question  
19 is before he came to work at CPS.

20 Q. That's right.

21 A. And that's the answer, yes, he has.

22 Q. And where else has he -- what other  
23 child welfare system has he worked at?

24 A. The ones I just told you.

25 Q. The youth courts you're talking about?

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1 A. Yes.

2 Q. Okay. You did not agree to the second  
3 MSA, did you?

4 A. You mean did I sign it?

5 Q. Yes.

6 A. Was I one of the signatories? No, I was  
7 not.

8 Q. You weren't involved in the discussions,  
9 and you certainly didn't sign it; is that right?

10 A. That's correct.

11 Q. And you didn't sign any of the interim  
12 or stipulated orders; is that right?

13 A. That's correct.

14 Q. And, in fact, you might not have even  
15 done that had you been present in this agency; is  
16 that right?

17 A. That's a possibility.

18 Q. Right. In fact --

19 A. If I knew then what I know now, I  
20 wouldn't have.

21 Q. Right, in fact, you don't like the --  
22 what you call the rigid fixed standards of the  
23 caseload limits, do you?

24 A. Well, I don't like the phrase, "I don't  
25 like them." I think they're harmful to children.

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1 Q. I see. And do you think that 15 years  
2 of noncompliance in this case is harmful to  
3 children?

4 MR. JONES: Object to the form.

5 THE WITNESS: Do I think that 15 years  
6 of noncompliance is harmful to children?

7 Q. (By Ms. Lowry) Yeah. Do you know how old  
8 this litigation is?

9 A. I can't answer that question without  
10 more specifics. I need to know what it is you  
11 think was harmful to children, and I can either  
12 agree with you or not, but when you say 15 years  
13 of noncompliance is harmful to children, that's a  
14 very general statement.

15 Q. Do you know that the State has  
16 acknowledged noncompliance with regard to the  
17 settlement agreement?

18 A. I do understand what you're asking me.  
19 I'm just -- I am not going to get to the place  
20 where I agree with you that noncompliance with one  
21 provision or another provision of that MSA, per  
22 se, translates into harm to children. I think  
23 compliance with the MSA in some respects is  
24 harmful to children, so your question is too  
25 general for me.

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1           If you ask me about a specific thing, I  
2   can tell you my opinion of whether it's harmful to  
3   children or not.

4           Q.    You, in fact, would like this provision  
5   changed, wouldn't you, because it seems too rigid  
6   and fixed as your counsel called it; is that  
7   right?

8           A.    The reason I would like it changed is  
9   because I believe it's harmful to children.

10          Q.    Okay. So -- and you would -- what would  
11   you substitute for it?

12          A.    I would substitute it for a standard  
13   that takes into account the factors that affect  
14   the handling of children's cases and the outcomes  
15   for those children. I would look to see if the  
16   children are having good outcomes, and I would  
17   look to see if the caseworkers are doing their  
18   jobs, and there are factors that are indicators of  
19   that, and, to me, that's what an agency should be  
20   judged on.

21          Q.    So, basically, what you're saying in the  
22   motion that's been filed on your behalf with  
23   regard to changing a provision of this agreement  
24   is that you think it's harmful to children, and  
25   you don't like it; is that right?

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1 MR. JONES: I object to --

2 THE WITNESS: I don't like anything  
3 that's harmful to children.

4 MR. JONES: And I object to the form of  
5 the question. That's not what the motion  
6 states.

7 MS. LOWRY: No, that's not, but I can  
8 ask the question anyway.

9 Q. (By Ms. Lowry) Okay. But you think this  
10 is harmful to children?

11 A. I think that the agency being judged --  
12 it's effectiveness being judged on a hard  
13 compliance cap in the way that a cap has to be  
14 implemented in a child welfare agency is harmful  
15 to children. It is harmful to the care for  
16 children.

17 Q. And so you wouldn't have signed it? You  
18 wouldn't have signed that provision of the  
19 agreement, is that --

20 A. I would not have agreed -- and, again,  
21 knowing what I know today, knowing what I know  
22 sitting here today, no, ma'am, I would not have  
23 agreed for the State to obligate itself in order  
24 to comply with the second MSA. I would not have  
25 agreed that the State be judged by a hard cap like

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1 that 90 percent cap. I would not.

2 MS. LOWRY: All right. I have nothing  
3 further.

4 (Time Noted: 4:16 p.m.)

5 SIGNATURE/NOT WAIVED

6

7 ORIGINAL: MARCIA ROBINSON LOWRY, ESQ.

8 COPY: J. LAWRENCE JONES, ESQ.

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